

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

FEB 15 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

vs.

VICTOR TANG

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§

CRIMINAL NO.

18 CR - 82

INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material to this indictment the following facts are applicable:

1. The National Aeronautics and Space Administration (NASA) is an agency or Department within the executive branch of the United States.
2. Tietronix Software Inc. (Tietronix) was a company based in Houston, Southern District of Texas, which supplied software programing to NASA.
3. Defendant, Victor Tang, was an owner/employee of Tietronix and he was contractually obligated to be honest and to disclose all relevant facts to NASA.
4. NASA, to its detriment, relied upon "false" reports by Victor Tang in approving modifications (change orders) to existing contracts and in awarding new contracts to Tietronix.

FALSE STATEMENTS

COUNT I

On or about June 13, 2013, in the Southern District of Texas, the defendant,

VICTOR TANG,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting a false “cost report” to NASA claiming Tietronix employees worked about 7,186 hours from October 1, 2012 to May 31, 2013 on delivery order seven (7) for contract NNJ11HA14C when in truth the total hours worked were about 6000 hours.

In violation of Title 18 United States Code, section 1001.

COUNT II

On or about December 4, 2013, in the Southern District of Texas, the defendant,

VICTOR TANG,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting a false “cost report” to NASA claiming Tietronix employees worked about 2,432 hours from October 1, 2012 to November 30, 2013 on delivery order eight (8) for contract NNJ11HA14C when in truth the total hours worked were about 2,114.

In violation of Title 18 United States Code, section 1001.

COUNT III

On or about March 9, 2014, in the Southern District of Texas, the defendant,

VICTOR TANG,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting a progress report on NASA contract NNX11CB37C which stated the total incurred costs for the work accomplished thus far were about \$712,181, when in truth the total costs of the work were about \$258,035.

In violation of Title 18 United States Code, section 1001.

COUNT IV

On or about October 10, 2014, in the Southern District of Texas, the defendant,

VICTOR TANG,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting a false “monthly performance report” to NASA claiming over 22,370 hours of work for the period of April 1, 2014 to September 30, 2014 regarding NNJ14RA02C when in truth the total number of hours were about 20,831 hours.

In violation of Title 18 United States Code, section 1001.

COUNT V

On or about October 6, 2015, in the Southern District of Texas, the defendant,

VICTOR TANG,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting a false “monthly performance report” to NASA claiming about 47,310 hours of work for the period of October 1, 2014 to September 30, 2015 regarding NNJ14RA02C when in truth the total number of hours were about 44,600 hours.

In violation of Title 18 United States Code, section 1001.

COUNT VI

On or about October 5, 2016, in the Southern District of Texas, the defendant,

VICTOR TANG,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting a false “monthly performance report” to NASA claiming about 48,007 hours of work for period of October 1, 2015 to September 30, 2016 regarding NNJ14RA02C when in truth the total number of hours were about 45,756 hours.

In violation of Title 18 United States Code, section 1001.

COUNT VII

On or about February 2, 2017, in the Southern District of Texas, the defendant,

VICTOR TANG,

did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement and entry in a matter within the jurisdiction of the executive branch of the Government of the United States, by submitting a false “monthly performance report” to NASA claiming about 17,019 hours of work for period of October 1, 2016 to January 31, 2017 regarding NNJ14RA02C when in truth the total number of hours was about 15,585 hours.

In violation of Title 18 United States Code, section 1001.

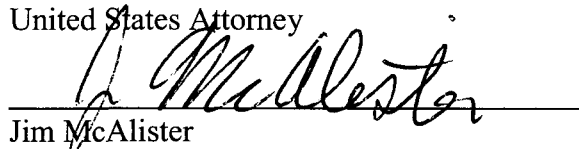
A TRUE BILL:

Original Signature on File

Foreperson of the Grand Jury

RYAN PATRICK
United States Attorney

By:


Jim McAlister
Assistant United States Attorney